

PRIVACY POLICY for the mobile application "CarDamageTest"

1. DEFINITIONS USED

"**Law**" means the Federal Law of the Russian Federation "On Personal Data" with all amendments and additions, as well as other legislative acts of the Russian Federation.

A "**mobile application**" is software (with all existing additions and improvements) designed to work on smartphones, tablets, watches and other mobile devices, and designed for a specific platform (iOS, Android, Windows Phone, etc.). For the purposes of this Policy, the Mobile Application means the following software: **CarDamageTest**.

"**Personal Data**" means a set of personal data and / or non-personal information about the User, provided by him to the Copyright Holder himself and / or automatically collected by the Copyright Holder and / or third parties.

"**Policy**" means this Mobile Application Privacy Policy (with all existing additions and changes).

"**User**" means a legal or natural person who has downloaded the Mobile Application to a smartphone, tablet, watch or any other mobile device and/or activated such Mobile Application on one of these devices.

"**Copyright Holder**" means the following person who owns the exclusive rights of ownership of the Mobile Application:

LIMITED LIABILITY COMPANY "FINOLAB.RU"

*105064, RUSSIA, MOSCOW, VN.TER.G. BASMANNY MUNICIPAL DISTRICT,
NIZHNY SUSALNY LANE, 5, BLD. 17, OGRN: 1197746468765, INN: 9725017061,
www.finolab.ru.*

"**Cookies**" means small files sent to any mobile application or website, and placed on the User's smartphones, tablets, watches and other mobile devices, in order to improve the operation of such applications or sites, as well as the quality of the content placed in them.

2. RELATIONSHIPS COVERED BY THE POLICY

General

This Policy is used and applies exclusively to Personal Data received from the User in connection with the use of the Mobile Application and any updates or additions to it. The provisions of this Policy are aimed at:

- (1) determination of the types and types of Personal Data received, the directions and purposes of use (processing) of Personal Data, as well as the sources of obtaining such Personal Data; and
- (2) determining the User's rights in relation to the protection of the confidentiality of the Personal Data transmitted by him; and
- (3) identification of persons responsible for the processing and storage of Personal Data, as well as third parties to whom such data are disclosed (in whole or in part).

The rules of this Policy do not apply in the case of processing by third parties of Personal Data that are voluntarily provided by the User.

By installing and / or activating the Mobile Application on a smartphone, tablet, watch or other mobile device, the User agrees to the terms of this Policy and gives his consent to the Copyright Holder to collect, process, retain and store Personal Data in the manner and on the terms provided for in this Policy.

If the User does not agree with the terms of the Policy and / or certain conditions of the Policy are not clear to him, in this case the User is obliged to immediately stop using the Mobile Application.

User's rights to protect personal data

In connection with the provision of Personal Data, the User automatically receives the following rights:

- (1) receive data relating to their processing (the grounds and purposes of such processing, the methods of processing used, information about the persons who have access to them or to whom they can be disclosed on the basis of a contract or the Law).
- (2) receive data on the location and identification data of persons performing processing and / or storage of Personal Data.
- (3) receive data on the retention periods of Personal Data.
- (4) receive data on the carried out or on the proposed cross-border transfer of Personal Data.
- (5) appeal against the actions or omissions of the Copyright Holder to the authorized body for the protection of the rights of personal data subjects or in court.
- (6) Right to rectification/deletion. If you discover errors in the Personal Data we process, you have the right to correct it accordingly. In addition, you have the right to supplement the data if it is not given in full or to delete it completely.

- (7) The right to withdraw your consent to the processing of Personal Data, if any.
- (8) receive compensation for losses and / or compensation for moral damage in court as a result of violations of the User's rights to the protection and protection of his Personal Data committed by the Copyright Holder and / or third parties.
- (9) exercise other rights in the field of personal data protection provided for by the Law or the provisions of this Policy.

3. LIST OF PERSONAL DATA COLLECTED

Non-personal information about users

In connection with the use of the Mobile Application, the Rightholder may automatically collect and process the following non-personal information about the User:

- (1) information about traffic, the possible number of clicks made, logs and other data.
- (2) information about the device from which the login is performed: device id, tip device, in the operating system, from the trunk, lam in, pviewing the screen.

Personal data about users

The Copyright Holder, for the purposes of using me by the Users of the Mobile Application, does not collect any personal data about the Users that allow him to be identified.

Use of cookies

This Mobile Application does not use certain Cookies to store any information about Users, mobile devices used by them.

Nopersonally identifiable information provided to Users for the purpose of using the Mobile Application

In connection with the use of the Mobile Application, the Copyright Holder receives from the User multimedia files (photo, video) with the extension *.mpeg, *.mp4, *.jpeg, *.png with the image of vehicles.

4. PURPOSES OF COLLECTION AND PROCESSING OF PERSONAL DATA

Determination of the purposes of processing

The collection and processing of Personal Data is carried out for the following purposes:

- (1) to implement the functionality of the Mobile Application - to provide Users with an analysis of damage to vehicles based on the information provided by users that is not personalized.

- (2) to analyze the User's behavior, as well as to identify the User's preferences.
- (3) for the prompt and correct operation of the Mobile Application, improving the functioning of the Mobile Application, improving the content of the Mobile Application, improving the internal architecture and functionality of the Mobile Application.
- (4) to comply with the requirements of the Act.
- (5) for technical support of the Mobile Application, identification of problems in its operation and their elimination.
- (6) to maintain communication with the User (communication).
- (7) to fulfill other obligations of the Copyright Holder that have arisen to the User.
- (7) for any other purpose, subject to obtaining separate consent from the User.

The processing of Personal Data is based on the principles of: **(1)** the lawfulness of the purposes and methods of processing; and **(2)** good faith; and **(3)** the compliance of the purposes of personal data processing with the purposes predetermined and stated when collecting such Personal Data; and **(4)** the compliance of the scope and nature of the Processed Personal Data with the stated purposes of their processing.

Terms of personal data processing

The processing of Personal Data is carried out in the following cases: **(1)** obtaining consent from the User; or **(2)** achieving by the Copyright Holder the goals provided for by an international treaty or the Law; or **(3)** providing the User with his Personal Data to an unlimited number of persons; or **(4)** fulfillment of other obligations of the Copyright Holder to the User, including, but not limited to, the provision of certain content to the User; or **(5)** saving the life or health of the User, when consent to the processing of his Personal Data cannot be obtained in advance.

In the case of depersonalization of Personal Data, which does not allow directly or indirectly to determine the User, the subsequent use and disclosure of such data to third parties is allowed and the rules of this Policy no longer apply to them.

The Rightholder takes all possible measures to protect the confidentiality of the Personal Data received, except in cases where the User has made such data publicly available.

The right holder collects, records, systematizes, accumulates, stores, refines (update, changes), extracts, uses, transfers (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data. The processing of personal data is carried out in the following ways:

- manual processing of personal data;
- automated processing of personal data with or without transmission of the information received via information and telecommunication networks "Internet";

- mixed processing of personal data.

The source of Personal Data is Users. The Rightholder does not collect information about the User, including Personal Data from third parties.

When processing PersonalData, the Copyright Holder performs the following functions:

- takes measures necessary and sufficient to ensure compliance with the requirements of the legislation of the Russian Federation in the field of personal data and local

normative acts of the Copyright Holder;

- takes legal, organizational and technical measures to protect personal data from unauthorized or accidental access to them, destruction, modification, blocking, copying, provision, dissemination of personal data, as well as from other illegal actions in relation to personal data;

- informs in accordance with the established procedure to the subjects of personal data or their representatives information about the availability of personal data relating to the relevant subjects, provides an opportunity to familiarize themselves with these personal data when contacting and (or) receiving requests from these subjects of personal data or their representatives, unless otherwise established by the legislation of the Russian Federation;

- stops processing and destroys personal data in cases provided for by the legislation of the Russian Federation in the field of personal data;

- performs other actions provided for by the legislation of the Russian Federation in the field of personal data

5. ACCESS OF THIRD PARTIES TO PERSONAL DATA

Using Analytics Platforms

The Rightholder does not use analytical platforms such as Google Analytics, Yandex services and others, including to track the frequency of visits to the site by Users; and (tracking the Ways in which the User uses the Mobile Application and / or its content; and identify the type and type of content that is popular among Users; and determine the Location of the User, etc.

Disclosure of personal data to third parties

The Rightholder has the right to disclose Personal Data **(1)** to its affiliates, branches and representative offices opened both in the territory of the Russian Federation and in the territory of other states; **(2)** the legal successors of the Rightholder who have arisen as a result of its liquidation, reorganization or bankruptcy, and who have received exclusive rights of ownership of the Mobile Application; **(3)** to third parties solely for the purpose of providing the User with or access to certain content; **(4)** to third parties, when the User has given consent to the disclosure, transfer or processing

of their Personal Data, as well as in other cases expressly provided for by the Law or this Policy.

The Rightholder discloses Personal Data only if **(1)** it is confident that third parties will comply with the terms of this Policy and take the same measures to protect the confidentiality of Personal Data that the Rightholder himself takes, and **(2)** consent to such disclosure was previously expressed by the User and / or is allowed on the basis of the Law.

6. ADVERTISING

Advertising in the mobile app

The Copyright Holder does not place advertising in the Mobile Application.

7. SENDING COMPLAINTS AND REQUESTS TO THE RIGHT HOLDER

Request to stop the processing of personal data

Each User has the right to express his objection to the Copyright Holder against the processing and / or storage of his Personal Data. Such an objection may be expressed as follows:

At the address of the e-mail posts: hello@finolab.ru,

By Russian Post: *105064, RUSSIA, MOSCOW, VN.TER.G. MUNICIPAL DISTRICT BASMANNY, NIZHNY SUSALNY LANE, 5, P. 17*

Request for information about personal data

If the User has any questions related to the procedure for applying or using this Policy, the procedure and / or method of processing Personal Data, the User may ask such a question as follows:

At the address of the e-mail posts: hello@finolab.ru,

By Russian Post: *105064, RUSSIA, MOSCOW, VN.TER.G. MUNICIPAL DISTRICT BASMANNY, NIZHNY SUSALNY LANE, 5, P. 17*

Modification (updating, addition, correction) or deletion of personal data

The User has the right to change or delete Personal Data at any time by sending a special request to the Copyright Holder at the following address:

At the address of the e-mail posts: hello@finolab.ru,

By Russian Post: *105064, RUSSIA, MOSCOW, VN.TER.G. MUNICIPAL DISTRICT BASMANNY, NIZHNY SUSALNY LANE, 5, P. 17*

The Rightholder has the right to refuse to change or delete Personal Data if such actions lead to **(1)** violation of the rules of this Policy; or **(2)** to violation of the Law; **(3)**

the nature of the Personal Data is evidence in any legal process that has arisen between the Copyright Holder and the User.

8. TERMS AND PROCEDURE FOR STORING PERSONAL DATA

Storage is carried out by third parties on behalf of the CopyrightHolder. The User gives his consent to the storage of his Personal Data by third parties on behalf of the Copyright Holder, provided that such third parties maintain the confidentiality of the Personal Data received. The functions of storing information are entrusted to the following person: Yandex. Cloud" (hereinafter referred to as the "**Guardian**"). Storage of Personal Data is carried out on the territory of the Russian Federation.

Storage is carried out for the entire period necessary to achieve the stated purposes of processing Personal Data.

The Rightholder undertakes immediately after achieving the purposes of processing Personal Data to destroy them or depersonalize them.

9. PROCEDURE FOR THE PROTECTION OF PERSONAL DATA

Protecting the confidentiality of Personal Data is a paramount and important task for the Copyright Holder. The Rightholder adheres to all required international standards, rules and recommendations for the protection of Personal Data.

The Rightholder has implemented a number of technical and organizational methods aimed at protecting Personal Data from disclosure or unauthorized access to them by third parties. In addition, the CopyrightHolder implements a policy of refusing to collect any non-impersonal Personal Data that allows identifying the User as a specific individual.

11. FINAL PROVISIONS

Availability of the policy text for review

Users can read the terms of this Policy:

- At the following link: https://finolab.ru/docs/privacy_policy_cv.pdf
- in the Mobile application on the start page

This version of the Policy is valid from September 1 to September 3 , 2022.

Edit and supplement the policy

The CopyrightHolder has the right to unilaterally make changes and additions to the terms of this Policy. The Copyright Holder does not bear any responsibility to the User for changing the terms of this Policy without the permission and / or consent of the User.

The User himself undertakes to regularly check the provisions of this Policy for its possible changes or additions. The Rightholder has the right to notify users in any of the available ways including, but not limited to: pop-up notifications, pop-up window, placement of the corresponding text on the main screen of the Application.

Applicable law

This Policy is developed in accordance with the current legislation on the protection of personal data of the Russian Federation, in particular, with the norms of the Federal Law of July 27, 2006 No. 152-FZ "On Personal Data" (with all additions and amendments), the Federal Law of July 21, 2014 No. 242-FZ "On Amendments to Certain Legislative Acts of the Russian Federation in Terms of Clarifying the Procedure for Processing Personal Data in Information and Telecommunication Networks" (with all additions and changes).

Risk of disclosure

Regardless of the measures taken by the CopyrightHolder to protect the confidentiality of the personal data received, the User is hereby considered to be duly acquainted with the fact that any transfer of Personal Data on the Internet cannot be guaranteed to be safe, and therefore the User carries out such a transfer at his own risk.